ECF CASE JUDGE DANIELS

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JOE HAND PROMOTIONS, INC., as Broadcast Licensee of the June 11, 2005 Tyson/McBride Program,

Plaintiff.

MOTION FOR CONTINUANCE

Civil Action No. 07-CV-6907 HON. GEORGE B. DANIELS

- against -

RICARDO MARTINEZ, Individually and d/b/a LUCKY 7,

and

LUCKY 7

Defendants.

Come now plaintiff, J & J SPORTS PRODUCTIONS, INC., and moves this Court for an Order of Continuance to adjourn the Conference from October 10, 2007 at 9:30 a.m.

Plaintiff has filed a Request for Clerk's Entry of Default in this matter and upon receipt of the Clerk's Certificate of Default, will prepare and file a Motion for Default Judgment.

Attached hereto is a proposed order for the Court setting forth the proposed relief requested herein.

Respectfully Submitted,

Dated: October 5, 2007 Ellenville, NY 12428

> /s/ Julie Cohen Lonstein JULIE COHEN LONSTEIN, ESQ. Attorney for Plaintiff Bar Roll No. JL8521 LONSTEIN LAW OFFICE, P.C. 1 Terrace Hill: P.O. Box 351 Ellenville, NY 12428

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ECF CASE JUDGE DANIELS

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JOE HAND PROMOTIONS, INC., as Broadcast Licensee of the June 11, 2005 Tyson/McBride Program,

Plaintiff,

CERTIFICATE OF SERVICE Civil Action No. 07-CV-6907 HON. GEORGE B. DANIELS

-against-

RICARDO MARTINEZ, Individually and d/b/a LUCKY 7,

and

LUCKY 7

Defendants

The undersigned certifies that on the 5th day of October 2007your deponent served the following documents by regular mail:

Motion for Continuance of Conference

on the following:

Ricardo Martinez 1203 Findlay Avenue Apt. 33A Bronx, NY 10456-4143

Lucky 7 658 Dawson Street Bronx, NY 10455

> /s/ Julie Cohen Lonstein Julie Cohen Lonstein